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ORIGINAL FILED

AUG 22 2011

**LOS ANGELES
SUPERIOR COURT**

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF LOS ANGELES**
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14 SHAHZAD M. QUDDUSI, an individual; et al.

15 Plaintiffs,

16 v.

17 ISLAMIC CENTER, NORTHRIDGE, a
18 California nonprofit corporation; et al.

19 Defendants.
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CASE NO.: BC433463

Assigned for All Purposes
JUDGE: Hon. Michelle R. Rosenblatt
DEPT.: 40

**DECLARATION OF JASON KIM IN
OPPOSITION TO PLAINTIFFS' EX
PARTE APPLICATION TO RESTRAIN
AND ENJOIN DEFENDANTS FROM
INTERFERING WITH PLAINTIFFS'
RIGHT TO ATTEND ICN**

**DATE: AUGUST 22, 2011
TIME: 1:30 A.M.
DEPT.: 40**

Action Filed: March 9, 2010
Trial Date: January 30, 2012

25 I, JASON KIM, declare:

26 1. I am over the age of eighteen and make the following declaration upon my own
27 personal knowledge. I am the IT Manager at McKay, de Lorimier & Acain, attorneys of record for
28 the defendants in the matter of Quddusi v ICN, Los Angeles Superior Court case number BC433463.

1 As IT Manager I report directly to Paul A. de Lorimier and I have held this position for the past eight
2 years.

3 2. I was instructed to attend the Islamic Center of Northridge on Sunday, August 21, 2011
4 as per a prior order of this court in which plaintiffs have been given leave to make two mirror copies
5 of the contents of the mosque's hard drive.

6 3. Plaintiffs' IT person in attendance on Sunday August 21, 2011 was Bob Patel of
7 Advance Computer Repair, Inc.

8 4. I was in attendance at the mosque to observe the actions of plaintiffs' IT person, Mr.
9 Patel.

10 5. Mr. Patel had a personal USB thumb drive which he used to install programs onto the
11 ICN computer of which he was supposed to making the mirror copies.

12 6. I had to stop the process when Mr. Patel installed two viruses into the ICN computer.
13 Attached hereto as **Exhibits "A" and "B"** are two screen shots. **Exhibit "A"** shows that his USB
14 drive installed a virus called "autorun.inf". The virus protection program on the ICN computer
15 brought up the "Threat detected!" shield alert. When the alert came up I observed Mr. Patel hit the
16 "ignore" button which resulted in installing the virus into the computer.

17 7. **Exhibit "B"** is a second screen shot which I made at the time of the IT inspection at
18 the ICN on August 21, 2011. **Exhibit "B"** shows that Mr. Patel installed a virus called "New
19 Folder.exe". I also observed him hit the "ignore" button when the "Threat detected!" shield alert was
20 activated. This action by Mr. Patel installed the "New Folder.exe" virus onto the ICN's computer.

21 8. Also visible on **Exhibit "B"** is the contents of Mr. Patel's USB drive that he had
22 plugged into the ICN computer. The contents of Mr. Patel's USB drive that he was using to install
23 programs included "Aurora Snow - Babysitter Fucked Hard," "Nisha - Superb Desi Girl in Anal
24 Action" and other programs.

25 9. Had I not stopped the actions of Mr. Patel he could have easily installed pornography
26 into the mosque's computer.

27 10. Mr. Patel's actions in installing viruses into the ICN computer is very unprofessional.
28 Using a USB drive to install programs which contain pornography is also highly unprofessional .

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct and that this declaration was executed in Los Angeles California on the 22nd day
3 of August, 2011.

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6 Jason Kim, Declarant
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AUG12

Resident Shield alert

Accessed files infected



Threat detected!

File name: edNewFolder

Threat name: Virus detected: Trojan/MSN/MSN/MSN

Detected on: 12/12/2011

More info: [Link]

Remove threat as Power User



Move to Vault

Go to [Link]



Hide details

Process name: F:\WINDOWS\Explorer.exe

Process ID: 3880

Aurora Snow - Babysitter Backed Hard

BabyDog

File media file (wmp)

Cell_Control_2011

DSC_0142

4005x3072

JPEG image

IE8-WindowsServer2003-x86-ENU

Self-Extracting Cabinet

Microsoft Corporation

Al & Grazioplene (1996)

Nishan-Superb Design Girl In Anal Action

File media file (wmp)

6.675 KB



New Volume (D:)

Resident Shield alert

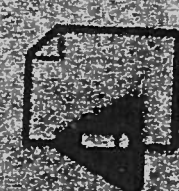


Local Disk (F:)



Accessed file is infected

Threat detected!



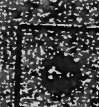
File name: e:\eubrun.m

Threat name: Virus identified Worm/AutoRun.L

Detected on: 08/11/2008

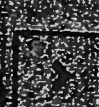
[More information about this threat](#)

☐ Remove threat as Power User



Move to Vault

Quarantine



Show details

e Storage